

1 DAVID Z. CHESNOFF, ESQ.
2 Nevada Bar No. 2292
3 RICHARD A. SCHONFELD, ESQ.
4 Nevada Bar No. 6815
5 CHESNOFF & SCHONFELD
6 520 S. 4th Street
7 Las Vegas, Nevada 89101
8 Telephone: 702-384-5563
9 Email: dzchesnoff@cslawoffice.net
10 rschonfeld@cslawoffice.net

11 MARK E. FERRARIO, ESQ.
12 Nevada Bar No. 1625
13 ALAYNE M. OPIE
14 Nevada Bar No. 12623
15 GREENBERG TRAURIG, LLP
16 10845 Griffith Peak Drive, Suite 600
17 Las Vegas, Nevada 89135
18 Telephone: (702) 792-3773
19 Facsimile: (702) 792-9002
20 Email: ferrariom@gtlaw.com
21 cowdent@gtlaw.com
22 opiea@gtlaw.com

23 *Attorneys for SHAC, LLC dba Sapphire Gentlemen's Club,
24 SHAC MT, LLC, David Michael Talla, and Peter Feinstein*

25 IN THE UNITED STATES DISTRICT COURT
26 FOR THE DISTRICT OF NEVADA

27 CORRISA JONES, on behalf of herself) Case No. 2:15-cv-01382- RFB-NJK
28 and on behalf of all others similarly)
situated,)
Plaintiffs,)
vs.)
SHAC, LLC, D/B/A SHAPPHIRE [sic]) STIPULATION TO EXTEND TIME
GENTLEMEN'S CLUB; SHAC MT,) FOR PARTIES TO FILE THEIR
LLC, DAVID MICHAEL TALLA and) JOINT PRETRIAL MEMORANDUM
PETER FEINSTEIN,) [Dkt. 247] AND FOR DEFENDANTS
Defendants.) TO FILE THEIR REPLY TO
PLAINTIFFS' OPPOSITION TO
MOTION FOR RECONSIDERATION
OF ORDER GRANTING PARTIAL
SUMMARY JUDGMENT [DKT 241]
AND/OR TO ALTER JUDGMENT

1 **COMES NOW**, Defendants SHAC, LLC, dba Sapphire Gentlemen's Club, SHAC MT,
2 LLC, David Michael Talla, and Peter Feinstein (collectively "Defendants"), by and through their
3 undersigned counsel of record David Z. Chesnoff, Esq., and Richard A. Schonfeld, Esq., of the law
4 offices of Chesnoff & Schonfeld, and Plaintiff Corissa Jones and all Plaintiffs who opted into the
5 instant action ("Class Plaintiffs") by and through their counsel David W. Hodges, Esq., and hereby
6 Stipulate as follows:

7 1. On December 21, 2020, the Honorable Court Ordered that the request to seal the
8 Order Granting Partial Summary Judgment was denied [Dkt 280]. As a result, the Honorable Court
9 Ordered that Defendants file their Reply to the Opposition to the Motion for Reconsideration [Dkt
10 245] by January 11, 2021, later extended to February 5, 2021, and currently due on February 11,
11 2021. However, the parties have agreed upon an amendment to the proposed FLSA Collective
12 Action Settlement and have filed a Motion for approval of the FLSA Collection Action Settlement
13 [Dkt 286].

14 2. Accordingly, the parties hereby stipulate that the deadline for the filing of Defendant's Reply
15 to the Opposition to the Motion for Reconsideration (due on February 12, 2021) as well as the Joint
16 Pretrial Memorandum (due on February 12, 2021), be stayed pending the Court's determination of
17 the request for approval of the FLSA Collective Action Settlement [Dkt 286]. In the event that the
18 Court does not approve the settlement, the Reply to the Opposition to the Motion for
19 Reconsideration and the Joint Pretrial Memorandum would be due 14 days after the denial of the
20 FLSA Collective Action Settlement;

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1 3. In the event that the Court approves the FLSA Collective Action Settlement, then there
2 would be no need to file the Reply to the Opposition to the Motion for Reconsideration and the Joint
3 Pretrial Memorandum as they will be rendered moot.

4 **IT IS SO STIPULATED.**

5 Dated this 11th day of February, 2021.

6 **CHESNOFF & SCHONFELD**

7 /s/ Richard A. Schonfeld
8 **DAVID Z. CHESNOFF, ESQ.**
9 **RICHARD A. SCHONFELD, ESQ.**
10 **520 South Fourth Street**
11 **Las Vegas, Nevada 89101**
12 **Tel.: [702] 38-5563**
13 **Counsel for Defendants**

14 **KENNEDY HODGES LLP**

15 /s/ David W. Hodges
16 **DAVID W. HODGES (admitted *pro*
17 *hac vice*)**
18 **4409 Montrose Blvd, Suite 200**
19 **Houston, Texas 77006**
20 **Counsel for Plaintiffs**

21 **ORDER**

22 **IT IS ORDERED** that the deadline for the filing of the Parties Joint Pretrial
23 Memorandum and the Reply to the Opposition to the Motion for Reconsideration [Dkt 245] are
24 hereby stayed pending the disposition of the Motion for approval of the FLSA Collective Action
25 Settlement.

26 **IT IS FURTHER ORDERED**, that in the event that the Court does not approve the
27 settlement, the Reply to the Opposition to the Motion for Reconsideration and the Joint Pretrial
28 Memorandum will be due 14 days after the denial of the FLSA Collective Action Settlement.

29 **IT IS FURTHER ORDERED**, that in the event that the Court approves the FLSA
30 Collective Action Settlement, then the Reply to the Opposition to the Motion for Reconsideration
31 and the Joint Pretrial Memorandum will not need to be filed as they will be rendered moot.

32 Dated this 22nd day of February, 2021.

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35 **RICHARD F. BOULWARE, II**
36 **UNITED STATES DISTRICT JUDGE**